



# VIETNAM PRIVACY NOTICE

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VERSION: 1.1



This Privacy Notice explains how Citibank, N.A., Ha Noi Branch and Ho Chi Minh City, Branch in Vietnam (collectively “Citi Vietnam”) collect, use, process and disclose your Personal Data.

For the purposes of this Privacy Notice, references to “we”, “Citi”, “us” or “our” are references to entities within Citigroup now and in the future.

## 1. When does this Privacy Notice apply to you?

This Privacy Notice applies to all Citi’s current employees, both permanent and temporary/contractual employees, and non-employees including but not limited to candidates.

## 2. What types of Personal Data does Citi process from you?

2.1. “Personal Data” means information in the form of symbols, scripts, notebooks, images, sounds or similar forms in the electronic environment attached to a specific person or helping to identify a specific person. Personal Data includes Basic Personal Data and Sensitive Personal Data.

2.2. Citi collects and processes the following categories of your Personal Data:

2.2.1. “Basic Personal Data” includes:

- a) Full name, middle name and birth name, other names (if applicable); date, month and year of birth; date, month, death or disappearance; gender; place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown and contact address; nationality; individual photograph; phone number, identity card number, personal identification number, passport number, driver's license number, license plate number, personal tax identification book, social insurance number, health insurance card number; marital status; information on family relationships (eg. parents, children, sibling, etc.); Information on personal accounts; personal data reflecting activities and history of activities in cyberspace; email address, work experience, educational background, languages skills information, previous work resume information, employment and resignation information and reasons, training record, any other information which you may provide to Citi via your resume, education certificate, marriage certificate, birth certificate or any other documents;
- b) Personal Data related to employment relationship: Employment identification number, position, working records, working locations, year of service, salary, benefit, tax, performance-related data, data related to work permit and visa in case of non-Vietnamese citizens, username and password for accessing systems of Citi when performing tasks, information relating to your usage of Citi’s devices, systems and assets, voice, video record, and data relating to disciplinary or misconduct;
- c) Other information related to the job recruitment or human resources management not specified in Clause 2.2.2.

- 2.2.2. “Sensitive Personal Data” includes political and religious views; health status and private life recorded in medical records, excluding information on blood type; information related to ethnic background and ethnic origin; information on inherited or acquired genetic characteristics of the individual; information on the individual's own physical attributes and biological characteristics; data on crimes and offences collected and stored by law enforcement agencies; data on the location of individuals determined through location services.
- 2.2.3. Citi may, in addition to the above, collect Personal Data from the Employees’ tax documents, credit bureau documents and training records.
- 2.2.4. Citi also collects the Personal Data of its employees’, non-employees’ and candidates’ related persons, including but not limited to parents, children, business referees, spouse, and/or domestic partners via various channels, including marriage certificate, birth certificate, copy of their Vietnamese identification card and/or passport. Citi may also collect Personal Data of your emergency contact person. Before providing their Personal Data to us, you shall ensure that such persons are duly notified about such collection, and that they have consented to the disclosure of their Personal Data to Citi.

### 3. Why does Citi process Personal Data?

Under the applicable laws, “Processing” of Personal Data means one or more activities affecting personal data, such as: collecting, recording, analysing, confirming, storing, editing, publicizing, combining, accessing, retrieving, revoking, encrypting, decoding, copying, sharing, transmitting, supplying, transferring, deleting, and destruction of personal data or other related actions.

The Personal Data provided by you or on your behalf to Citi from time to time prior to or in the course of your employment with Citi (if employment is subsequently offered to you) or as an employee of a service provider to Citi shall be used by Citi for legitimate purposes which include without limitation workforce relations and human resources administration, business administration and operation management, information security and technology services, physical security and safety, prevention, detection and prosecution and to comply with obligations imposed by law.

To be clarified further, Citi collects and processes your Personal Data for different purposes, as set out below:

- a) Where the collection or processing is necessary for Citi to perform a contract with you, or to proceed with your request, prior to entering into a contract:
  - i. To perform the recruitment process either by Citi or via Citi’s human resources and talent management service providers, determine the terms of employment contract, scope of works, salary, benefits, employment term, and any other purposes related to the establishment and management of employment relationship, including to entering into an employment contract and performing obligations under an employment contract, and any amendments of the contract, appendixes, policies, rules, regulations and any other documents related to the employment relation.



- ii. To generate employment identification number, agent code, and username and password to access Citi's systems for the purposes of performing tasks under the employment contract.
- iii. To issue employee access card, to manage and grant access rights within the premises and access rights to the systems pursuant to your position as indicated in employment contract. Citi also uses your Personal Data to facilitate and provide adequate supports and devices for you to perform your tasks under the employment contract efficiently.
- iv. To arrange for the payments/deduction to be made to/from your designated bank account or by other means as may be agreed between you and Citi from time to time, including, but not limited to salary, bonuses, other benefits and reimbursement.
- v. To administer and maintain records on your working days, working hours, vacation, absence, and leave.
- vi. To assess your performance, review your salary, compensation, benefits and entitlement, and determine your continued employment relationship with Citi or termination of employment contract. The assessment result may be used by Citi in order to provide you with an appropriate training or skill development courses.
- vii. To arrange for your accommodation and transportation which are necessary for or form part of the employment relationship.

If you do not provide certain Personal Data when requested, Citi may not be able to proceed with your request to enter into an employment contract, or may not be able to perform contractual obligations, either in whole or in part, which may include the provision of benefits, welfare or compensation to you.

b) Where the collection and processing are required by applicable laws:

- i. To register you as an insured person with the Social Insurance Department ("SID"), and to submit your Personal Data relating to your employment with us, termination of your employment or your resignation to the SID.
- ii. If you are non-Vietnamese citizen, your Personal Data is required in order to apply for a work permit and appropriate visa for you to be able to legally work in Vietnam.
- iii. To record telephone conversations and electronic communications between you and Citi's customers, as required by Citi's internal policies and procedures, authorities or regulators under applicable laws and regulations.
- iv. To disclose your Personal Data to Citi affiliates, any other governmental agencies or regulatory authorities, or to the courts.

c) Where necessary for Citi's or third party's legitimate interests:

- i. To monitor, detect, prevent, investigate and prosecute fraud and other criminal activity, or violation of employment contract, or other policies, rules

and regulations of Citi, and to share your Personal Data with Citi affiliates for the aforesaid purposes. This includes gathering information and evidence relating to your disciplinary or misconduct.

- ii. To monitor your use of our information, data, properties, assets and communication systems and devices to ensure your compliance with our policies, rules, regulations and to provide work related support and planning.
  - iii. To examine whether any conflict of interests may arise which would be detrimental or cause disadvantageous to the business operations or reputation of Citi.
  - iv. To protect Citi's rights, property, personnel, safety, business operations, and customers, Citi may record your voice during your communications with Citi's personnel. In addition, Citi also records your images and motions via our installed CCTV when you are in our premises, or Citi may request for footage from other third parties, which may include your images and/or motions, if this is required to protect our lawful interests.
  - v. To manage Citi's information technology systems, to ensure the adequacy of the security relating to such systems, and to prevent any loss, unauthorized or unlawful access to Citi's computers, networks, systems or servers, and to prevent any malicious software distribution or spams.
  - vi. To investigate and respond to any complaints, disputes, or inquiries raised by any other person against or relating to you which are relating to your employment relationship with Citi, for example, your services or your performance.
  - vii. To analyze information gathered during the exit interviews in order to gain better understanding on the turnover rates, and to determine necessary plans or actions in order to manage and improve employee retention.
- d) Where you consent to the processing of your Personal Data:
- i. In certain circumstances, to collect your Sensitive Personal Data for the purposes prescribed herein. Citi may also collect your health-related data, or request a medical certificate, to support your request for sick leaves or other employment-related request, or to reimburse for the medical expenses (if applicable).
  - ii. To publish your photograph on public domain such as Citi's website, newspaper, or other social media.
- e) Where necessary for the establishment, compliance, exercising, or defense of Citi's legal claims.
- f) Where the collection or processing of your Personal Data is necessary to protect the vital interest, including where you have an accident or serious illness.
- g) Your Personal Data may be used for registering with counterparts such as banks, agents or vendors in the course of business of Citi, where necessary.

#### 4. Where does Citi process Personal Data?

- a) Directly from you: Citi collects and processes Personal Data that you provide to us directly during the employment process and via Citi's systems.
- b) Other sources: To the extent permitted by applicable laws, Citi may collect and process your Personal Data and/or Sensitive Personal Data from other sources, including but not limited to online public sources, third party vendors who provide background checking services, hospitals, insurance companies, court judgements, and any other governmental agency or entity.

#### 5. To whom does Citi disclose Personal Data?

Citi discloses Personal Data to others, as follows:

- a) To any of Citi's affiliates or group companies, both within and outside Vietnam, for the purpose of managing your employment relationship with us, to perform our contractual obligations, and for other purposes as identified in this Privacy Notice.
- b) to third party vendors who provide services to Citi, including payroll service provider, insurance companies, hospitals, provident fund providers, and criminal or screening check services.
- c) To Citi's counterparts such as banks, agents or vendors in the course of business of Citi.
- d) to third parties in the circumstances where you have given consent to the third parties to contact Citi and obtain information about yours, including when you apply for loan or financial products with other financial institutions.
- e) to external legal counsels in the case of disputes, fraud, legal proceedings and legal execution, as well as to protect Citi's rights, property, personnel, safety, business operations, and customers.
- f) to both Citi's internal and external auditors, and accountants.
- g) to any competent regulatory, prosecuting, tax or governmental agencies, courts or other tribunals in any jurisdiction, including relevant government authorities.
- h) to third parties in connection with a change of ownership in Citi, or any of its assets or properties; To third party service providers providing software, network, cloud services and other IT providers.
- i) to any domestic or overseas agents, contractors, or third party service providers who engage to provide management, personnel, data processing, communication, computer, legal, financial or other services to Citi for the purposed stated herein; and
- j) to any other persons or entities to whom Citi is required to make disclosure by applicable laws.

## 6. Where does Citi transfer Personal Data?

Citi regularly transfers Personal Data to its affiliates and group companies for contractual obligation purposes i.e. to management candidacy and/or employment relationship, and in certain circumstances, and third parties (e.g. service providers), located outside Vietnam, which may have different data protection standards to those prescribed by the data protection authority in Vietnam. In addition, most of our servers, which we use to process and store your Personal Data for the purposes prescribed herein this Privacy Notice, are located outside Vietnam. Notwithstanding that, Citi ensures that it will protect your Personal Data by implementing adequate personal data protection standards for the transfer of your Personal Data outside Vietnam. Citi shall also ensure that any third parties to whom your Personal Data will be disclosed, shall implement adequate personal data protection standards, and where your Personal Data will be transferred within Citi's affiliates or group companies, Citi shall use data transfer mechanisms, i.e. binding corporate rules.

## 7. For how long does Citi retain Personal Data?

- a) In accordance with the record retention period specified in accordance with Citi's Records Management Policy, unless otherwise required or permitted by applicable laws, Citi will retain and process your Personal Data as follows:
  - i. For employee and non-employees, Citi will retain and process your Personal Data for the entire term of your employment with us.
  - ii. For applicants, Citi will continue to retain and process your Personal Data during and after the recruitment period for the purposes of contacting you, talent retention and anticipating appropriate human resource management and planning.
- b) Where Citi processes the Personal Data solely with your consent, the Personal Data will be deleted, destroyed, or de-identified, subject to the requirements and conditions prescribed by the applicable laws.

## 8. What are your rights in relation to Personal Data?

You are entitled to: (a) be aware of the Processing of your Personal Data; (b) partially or totally consent to allow the Processing of your Personal Data; (c) partially or totally withdraw your consent at any time, provided that there is no other legal ground for Citi to continue with the processing of your Personal Data; (d) request to have access to and obtain a copy of or request that your Personal Data be corrected, updated or completed your Personal Data; (e) request that your Personal Data be deleted or destroyed; (f) restrict of processing of your Personal Data; (g) object to the collection, use and/or disclosure of your Personal Data, especially where such collection, use, or disclosure is for the marketing purposes; (g) lodge complaints, denounce and initiate lawsuits; (h) claim for damages incurred from a violation of the provisions on the protection of personal data; and (i) self-protection of your Personal Data.

The exercise of your rights is subject to the limitations prescribed by law and other agreements between you and us.

In case of either your partially or totally consent or withdrawal, we might not be able to carry out certain activities and it will have impact to the implementation of any agreement or process between you and Citi. Withdrawal of your consent will not affect any processing of your Personal Data for which you have already provided consent, and which has already taken place prior to such withdrawal.

## 9. What are your obligations in relation to Personal Data?

You have obligation to provide complete and accurate your Personal Data to Citi and to update to us any changes of such as well as to properly perform other obligations for protection of Personal Data as required by applicable laws.

## 10. How Personal Data to be secured?

We implement technical and organizational measures that are appropriate to the risk to protect the Personal Data that we process about you. This may include:

- a. Implementing policies and procedures to protect Personal Data.
- b. Access to your Personal Data is limited to those people who need the information to perform their role. These people have unique identifying codes and passwords that must be used to access the systems that store your Personal Data.
- c. Educating staff about Citi's policies and procedures to Processing of your Personal Data securely.
- d. Entering into written agreements with third parties which include appropriate security measures to protect Personal Data in line with Citi policies and our obligations.

## 11. Consequences and Unexpected Damages that are Likely to Occur

Despite all of our best efforts, the processing of your Personal Data may pose the risk of data leakage or inappropriate handling of data from time to time, for example, if a Citi employee sends an email to the wrong recipient or leaves documents on public transport. Citi has policies and processes, such as the Electronic Communications Policy, that all employees must be familiar with in order to ensure that our information is kept secure and confidential.

## 12. Storage of Personal Data

- 12.1 Principally, your Personal Data collected by Citi will be stored inside Vietnam. However, as part of a global company, and for the purposes stated herein, Citi may need to use various systems to Process your Personal Data, including systems hosted in servers within or outside of Vietnam. As a result, your Personal Data may also be stored or transferred to and stored outside of Vietnam.
- 12.2 Citi maintains computer systems in data centers and at other locations in the United States of America and in various countries throughout the world and that Citi may collect, store, process, disseminate or use your Personal Data in manner that causes it to be transferred or accessed from computer systems



owned or operated by or on behalf of Citi throughout its global computer network.

### **13. Processing of Personal Data in cases where the consent is not required**

- a) In emergency cases, Personal Data should be immediately processed to protect your life and health or others. Citi is responsible for proving the case.
- b) The disclosure of Personal Data is in accordance with the provisions of law.
- c) To perform your contractual obligations with relevant agencies, organizations and individuals in accordance with the provisions of law.
- d) To serve the operation of state agencies prescribed by the law on sectoral expertise.

### **14. Updating Personal Data**

Keeping Personal Data accurate, complete and up-to-date is very important for both of Citi and your own interests. If your Personal Data or your related persons' Personal Data you have provided to Citi is inaccurate, incomplete or changed, you have the responsibility to promptly update such data into relevant Citi's systems, or by contacting our Human Resources Department.

### **15. Processing of children Personal Data**

Be noted that the processing of children's Personal Data shall always be carried out in accordance with the principle of protecting the rights and in the best interests of children.

The processing of Personal Data of children shall require the consent of the child where the child is 7 years of age or older and with the consent of his or her parents or guardians as prescribed, except for the case we can process without consent. We shall verify the age of children before processing children's Personal Data.

The processing of children's Personal Data shall be stopped, irreversibly deleted or destroyed in the following cases:

- a) The processing of data is for improper purposes or the purpose of processing the Personal Data as agreed has been fulfilled;
- b) The parent or guardian of the child withdraws his/her consent to process the child's Personal Data;
- c) At the request of a competent authority when there are sufficient grounds to prove that the processing of Personal Data of children affects the legitimate rights and interests of children.



## 16. How can You Contact Citi?

If you would like to exercise any of your Data Subject Rights, you may contact us as follows:

- **For Candidate and ex-employee:** please send email to [hrdataprivacy@citi.com](mailto:hrdataprivacy@citi.com)
- **For Active employee:** you can exercise personal data handling request via self-service in Workday. For personal data changes which cannot be made directly via self-service in Workday, then you may raise a new [HRHelpCenter](#) request via **Citi For You>Workplace> Privacy Act Request**

## 17. Changes to this Privacy Notice

Citi may amend, change, or update this Privacy Notice from time to time, whereby Citi will notify you about such changes via Citi website of the [Global Workforce Member Privacy Notice](#) and [Careers Privacy Notice](#)

In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, Citi will notify you about such changes and obtain your consent (if applicable), prior to such changes becoming effective.

This Privacy Notice shall take effect **from 31 October 2024 onward**.